

# EXHIBIT

# X

Declaration of Guy Frederick Noel Martin  
In Opposition to Plaintiffs' Motion to Compel  
Against Yassin Abdullah Kadi

03 MDL 1570

January 2018



HM TREASURY

## General Notice of Revocation of Article 4 Direction

22 December 2008

### Terrorism (United Nations Measures) Order 2001 (S.I. 2001/3365)

Where a condition set out in article 4(1) of the Terrorism (United Nations Measures) Order 2001 (SI 2001/3365) ("the Order") is satisfied, the Treasury had power by notice to direct that a person's funds are to be frozen.

On 12 October 2001, the Treasury through the Bank of England as its agent by notice gave a direction under Article 4(1) of the Order.

The Treasury revokes this direction insofar as it applies to the person set out in the Annex to this notification with immediate effect. The individual's funds are therefore no longer subject to the provisions of the Terrorism (United Nations Measures) Order 2001.

However, this does not affect financial restrictions in place under the Al-Qaida and Taliban (United Nations Measures) Order 2006 (SI 2006/2952). Therefore, for the time being, the individual's funds and economic resources remain frozen under the Al-Qaida and Taliban (United Nations Measures) Order 2006, and the individual remains on the Consolidated List of Financial Sanctions Targets under the Al-Qaida and Taliban regime on the Treasury's website.

Previous releases related to Terrorism, Al-Qaida and the Taliban and a consolidated list of individuals and entities subject to these and other UK financial sanctions regimes are available from the Financial Sanctions pages of the Treasury website: [http://www.hm-treasury.gov.uk/fin\\_sanctions\\_index.htm](http://www.hm-treasury.gov.uk/fin_sanctions_index.htm)

Non-media enquiries should be addressed by post to the Asset Freezing Unit, HM Treasury, 1 Horse Guards Road, London SW1A 2HQ, or by phone 020 7270 5454/5664, by fax 020 7451 7677 or by e-mail to [assetfreezingunit@hm-treasury.gov.uk](mailto:assetfreezingunit@hm-treasury.gov.uk).

Media enquiries should be addressed to the Treasury Press Office on 020 7270 5238.

ENDS

22 December 2008

**ANNEX TO GENERAL NOTICE OF REVOCATION OF ARTICLE 4 DIRECTION**

**TERRORISM (UNITED NATIONS MEASURES) ORDER 2001 (S.I. 2001/3365)**

**INDIVIDUAL**

**AL-QADI, Yasin**

DOB: 23 February 1955 \*

POB: Cairo, Egypt \*

a.k.a: (1) KADI, Shaykh, Yassin, Abdullah

(2) KAHDI, Yasin

(3) QADI, Yasin, Abdullah, Ezzedine

Nationality: Saudi Arabian \*

Passport Details: (1) B 751550 (2) E 976177. Issued 6 March 2004, expiring 11 January 2009 \*

Other Information: Male. Jeddah, Saudi Arabia. UN Ref QI.Q.22.01\*

The above individual is no longer subject to the Terrorism (United Nations Measures) Order 2001 but remains subject to the Al-Qaida and Taliban (United Nations Measures) Order 2006. Therefore, the individual's funds and economic resources remain frozen and the individual remains on the Consolidated List of Financial Sanctions Targets under the Al-Qaida and Taliban regime on the Treasury's website.

The details listed by the United Nations include a.k.a (3) Yasin Abdullah Ezzedine QADI as the prime alias and Yasin AL-QADI as an a.k.a. The listing for the individual on the Consolidated List has been altered to align with the United Nations details.

HM Treasury  
22 December 2008

\* DOB, POB, Nationality, Passport Details and UN Ref are taken from the UN listing under the Al-Qaida and Taliban regime. These did not form part of the original listing under the Terrorism (United Nations Measures) Order 2001.

---

**TERRORISM (UNITED NATIONS MEASURES) ORDER 2001 (S.I. 2001/3365)**

---

**REVOCATION OF ARTICLE 4 DIRECTION**

---

1. On 12 October 2001, the Treasury gave a direction under article 4(1) of Terrorism (United Nations Measures) Order 2001 (SI 2001/3365) ("the Order") designating a number of persons including:

**Al-Qadi, Yasin**

a.k.a: (1) KADI, Shaykh, Yassin Abdullah

(2) KAHDI, Yasin

(3) QADI, Yasin, Abdullah, Ezzedine

Other Information: Jeddah, Saudi Arabia

2. The Treasury revokes that direction in so far as it relates to the above-named person with effect from 12.00 today.
3. The Treasury intends to publicise generally this revocation.

Asset Freezing Unit  
**HM Treasury**

22 December 2008



HM TREASURY

## Financial Sanctions Notice

15/10/2012

### Al-Qaida

#### Commission Implementing Regulation (EU) No 933/2012

This notice is issued in respect of the restrictive measures directed against certain persons and entities associated with the Al-Qaida network.

1. With the publication of Commission Implementing Regulation (EU) No 933/2012 of 11 October 2012 in the Official Journal of the European Union (O.J. L 278, 12.10.2012, p.11) on 12 October 2012, the European Commission has amended Annex I to Council Regulation (EC) No 881/2002 ("the 2002 Regulation"), with effect from 13 October 2012.
2. Annex I to the 2002 Regulation lists the persons, groups and entities subject to the freezing of funds and economic resources provisions contained in the 2002 Regulation.
3. The amendments reflect the decisions made on 3 and 5 October 2012 by the United Nations Security Council (UNSC) Committee established pursuant to resolution 1267 (1999) to remove one individual from the UN Al-Qaida list and amend the identifying information of one existing entry.
4. The individual whose name has been deleted from Annex I is no longer subject to the asset freeze imposed by the 2002 Regulation.
5. The Treasury's Consolidated List of persons subject to financial sanctions in effect in the UK, which is maintained on the Treasury website, has been updated to reflect the deletion and amendment.
6. Details of the deletion and amendment are set out in the Annex to this notice.
7. It should be noted that the Annex to this notice and the Consolidated List include certain background information provided by the UN Sanctions Committee that is not included in Annex I to regulation 881/2002.

#### Reporting requirements

8. Relevant institutions and other persons are requested to check whether they maintain any accounts or otherwise hold any funds or economic resources for the person set out in the Annex to this notice whose details have been amended in Annex I to the 2002 Regulation. If so, they must freeze such accounts or other funds and, unless licensed by the Treasury, refrain from dealing with the funds or making them available to such persons.
9. Relevant institutions must report their findings to the Treasury, together with any additional information that would facilitate compliance with the 2002 Regulation.
10. Where a relevant institution has already reported details of accounts, other funds or economic resources held frozen for designated persons, they are not required to report these details again.

#### Other information

11. A copy of Commission Implementing Regulation (EU) No 933/2012 can be obtained from the Official Journal of the European Union website:  
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ.L.2012:278:0011:0012:EN:PDF>
12. Copies of relevant Releases, certain EU Regulations, UNSC Resolutions and UK legislation can be obtained from the Al-Qaida page on the Financial Sanctions pages of the Treasury website:  
[http://www.hm-treasury.gov.uk/fin\\_sanctions\\_alqaida.htm](http://www.hm-treasury.gov.uk/fin_sanctions_alqaida.htm).
13. Further details on the UN measures in respect of Al-Qaida can be found on the UN Sanctions Committee webpage: <http://www.un.org/sc/committees/1267/index.shtml>.

#### Enquiries

14. Non-media enquiries, reports and licence applications should be addressed to:

Sanctions and Illicit Finance  
Asset Freezing Unit  
HM Treasury  
1 Horse Guards Road  
London  
SW1A 2HQ  
E-mail: [AFU@hmtreasury.gsi.gov.uk](mailto:AFU@hmtreasury.gsi.gov.uk)

15. Media enquiries should be addressed to the Treasury Press Office on 020 7270 5238.

HM Treasury  
15/10/2012

15/10/2012

## ANNEX TO NOTICE

## FINANCIAL SANCTIONS: AL-QAIDA

COMMISSION IMPLEMENTING REGULATION (EU) NO 933/2012  
AMENDING ANNEX I TO COUNCIL REGULATION (EC) NO 881/2002

DELETION

## Individual

1. ~~QADI, Yasin Adbullah Ezzedine~~  
 DOB: 23/02/1955  
 POB: Cairo, Egypt  
 a.k.a: (1) AL-QADI, Yasin  
       (2) KADI, Shaykh, Yassin, Abdullah  
       (3) KAHD, Yasin  
 Nationality: Saudi Arabian  
 Passport Details: (1) B751550  
                       (2) E976177. Issued on 06 Mar 2004. Expired 11 Jan 2009  
 Address: Farsi Centre - West Tower 11th floor, Suite 1103, Wally Al-Ahd Street,  
 Ruwais District, P.O. Box 214, Jeddah 21411, Saudi Arabia  
 Other Information: UN Ref QI.Q.22.01  
 Group ID: 7010

AMENDMENT

Deleted information appears in strikethrough. Additional information appears in italics and is underlined.

## Entity

1. **AL-QAIDA IN THE ARABIAN PENINSULA (AQAP)**  
 a.k.a: (1) Al-Qaida in the South Arabian Peninsula  
       (2) Al-Qaida of Jihad Organization in the Arabian Peninsula  
       (3) Al-Qaida Organization in the Arabian Peninsula (AQAP)  
       (4) Tanzim Qa'idat al-Jihad fi Jazirat al-Arab  
       (5) *Ansar al-Shari'a (AAS)*  
 f.k.a: Al-Qaida in Yemen (AQY)  
 Other Information: UN Ref QE.A.129.10. AQAP is a regional affiliate of Al-Qaida and an armed group operating primarily in Arabian Peninsula. Location - Yemen.  
 Alternative location - Saudi Arabia (2004-2006). Formed in Jan 2009 when Al-Qaida in Yemen combined with Saudi Arabian Al-Qaida operatives. Leader of AQAP is Nasir 'abd-al-Karim 'Abdullah Al-Wahishi and his deputy is Said Ali Al-Shihri. *Ansar al Shari'a was formed in early 2011 by AQAP and has taken responsibility for multiple attacks in Yemen against both government and civilian targets.*  
 Group ID: 11044.

HM Treasury  
15/10/2012

KADI0093584

## COUNCIL COMMON POSITION

of 27 May 2002

concerning restrictive measures against Usama bin Laden, members of the Al-Qaida organisation and the Taliban and other individuals, groups, undertakings and entities associated with them and repealing Common Positions 96/746/CFSP, 1999/727/CFSP, 2001/154/CFSP and 2001/771/CFSP

(2002/402/CFSP)

THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty on European Union, and in particular Article 15 thereof,

Whereas:

(1) On 19 October 2001, the European Council declared that it is determined to combat terrorism in every form throughout the world and that it will continue its efforts to strengthen the coalition of the international community to combat terrorism in every shape and form.

(2) On 16 January 2002 the United Nations Security Council adopted Resolution 1390(2002), hereinafter referred to as 'UNSCR 1390(2002)', setting out measures to be imposed against Usama bin Laden, members of the Al-Qaida organisation and the Taliban and other individuals, groups, undertakings and entities associated with them.

(3) UNSCR 1390(2002) adjusts the scope of the sanctions concerning the freezing of funds, the visa ban and the embargo on supply, sale or transfer of arms as well as on technical advice, assistance or training related to military activities imposed by UNSCR 1267(1999) and 1333(2000).

(4) In accordance with paragraph 3 of UNSCR 1390(2002), the above measures will be reviewed by the UN Security Council 12 months after adoption of the resolution and at the end of this period the Security Council will either allow the measures to continue or decide to improve them.

(5) UNSCR 1390(2002) imposes a travel ban on Usama bin Laden, members of the Al-Qaida organisation and the Taliban and other individuals associated with them.

(6) The sanctions concerning the flight ban and the embargo on acetic anhydride sale imposed by UNSCR 1267(1999) and 1333(2000) are no longer in force in accordance with paragraph 23 of UNSCR 1333(2000) and paragraph 1 of UNSCR 1390(2002). Moreover, all restrictive measures against Ariana Afghan Airlines were terminated by UNSCR 1388(2002) of 15 January 2002.

(7) Therefore, the European Union restrictive measures adopted pursuant to UNSCR and 1333(2000) should be adjusted in accordance with UNSCR 1390(2002).

(8) For the sake of clarity and transparency, those European Union restrictive measures as referred to in the relevant Council Common Positions should be compiled in one legal instrument and therefore Common Positions 96/746/CFSP<sup>(1)</sup>, 1999/727/CFSP<sup>(2)</sup>, 2001/154/CFSP<sup>(3)</sup> and 2001/771/CFSP<sup>(4)</sup> should be repealed.

(9) Action by the Community is needed in order to implement certain measures.

HAS ADOPTED THIS COMMON POSITION:

## Article 1

This Common Position applies to Usama bin Laden, members of the Al-Qaida organisation and the Taliban and other individuals, groups, undertakings and entities associated with them, as referred to in the list drawn up pursuant to UNSCR 1267(1999) and 1333(2000) to be updated regularly by the Committee established pursuant to UNSCR 1267(1999).

## Article 2

1. The direct or indirect supply, sale and transfer to the individuals, groups, undertakings and entities referred to in Article 1 of arms and related materiel of all types including weapons and ammunition, military vehicles and equipment, paramilitary equipment, and spare parts for the aforementioned, from the territories of the Member States, or using their flag vessels or aircraft, or by nationals of Member States outside their territories, under the conditions set out in UNSCR 1390(2002), shall be prohibited.

2. Without prejudice to the powers of Member States in the exercise of their public authority, the European Community, acting within the limits of the powers conferred on it by the Treaty establishing the European Community, shall prevent the direct or indirect supply, sale and transfer to the individuals, groups, undertakings and entities referred to in Article 1 of technical advice, assistance, or training related to military activities from the territories of the Member States, or using their flag vessels or aircraft, or by nationals of Member States outside their territories, under the conditions set out in UNSCR 1390(2002).

<sup>(1)</sup> OJ L 342, 31.12.1996, p. 1.

<sup>(2)</sup> OJ L 294, 16.11.1999, p. 1.

<sup>(3)</sup> OJ L 57, 27.2.2001, p. 1.

<sup>(4)</sup> OJ L 289, 6.11.2001, p. 36.



29.5.2002

EN

Official Journal of the European Communities

L 139/5

*Article 3*

The European Community, acting within the limits of the powers conferred on it by the Treaty establishing the European Community:

- shall order the freezing of the funds and other financial assets or economic resources of the individuals, groups, undertakings and entities referred to in Article 1,
- shall ensure that funds, financial assets or economic resources will not be made available, directly or indirectly, to or for the benefit of the individuals, groups, undertakings and entities referred to in Article 1.

*Article 4*

Member States shall take the necessary measures to prevent the entry into, or transit through, their territories of the individuals referred to in Article 1 under the conditions set out in paragraph 2(b) of UNSCR 1390(2002).

*Article 5*

Common Positions 96/746/CFSP, 1999/727/CFSP, 2001/154/CFSP and 2001/771/CFSP are hereby repealed.

*Article 6*

This Common Position shall take effect on the date of its adoption.

This Common Position shall be kept under constant review.

*Article 7*

This Common Position shall be published in the Official Journal.

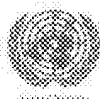
Done at Brussels, 27 May 2002.

*For the Council*

*The President*

M. ARIAS CAÑETE

5 October 2012



Security Council  
SC/10785

Department of Public Information • News and Media Division • New York

**SECURITY COUNCIL AL-QAIDA SANCTIONS COMMITTEE DELETES ENTRY  
OF YASIN ABDOULH EZZEDINE QADH FROM ITS LIST**

**Decision Taken Following Review of Defining  
Request Submitted Through Office of the Ombudsman**

On 5 October 2012, the Security Council Al-Qaida Sanctions Committee removed the name of Mr. Yasin Abdulah Ezzedine Qadh from the Al-Qaida Sanctions List after concluding its consideration of the deferring request submitted by this individual through the Ombudsman established pursuant to Security Council resolution 1964 (2010), and after considering the Comprehensive Report of the Ombudsman on this deferring request.

Therefore, the assets freeze, travel ban and arms embargo set out in paragraph 1 of Security Council resolution 1985 (2011) no longer apply to the following individual:

**Removed from Section A, Individuals associated with Al-Qaida**

**Q.D.Z.M. Name:** 1. YASIN 2. ABDOULAH 3. EZZEDINE 4. QADH

**Name (original script):** ياسين عبد الله عز الدين قاذي

**Title:** no Designation: no DOB: 23 Feb. 1955 POB: Cairo, Egypt **Good quality a.k.a.:** al-Nafi, Shaikh Yassin Abdullah b) Kadi, Yasin c) Yasin Al-Qadi **Low quality a.k.a. or**  
**Nationality:** Saudi Arabia **Passport no.:** a) Passport number 8 751660 b) Passport number E 576177, issued on 5 Mar. 2004, expired on 11 Jan. 2009 **National Identification no.:** no  
**Address:** P.O. Center - West Tower 15th floor, Suite 1103, Vally Al-Riad Street, Riyadh District, P.O. Box 214, Jeddah 21811, Saudi Arabia **Linked to:** 17 Oct. 2001 (amended on 23 Apr. 2007, 18 Dec. 2010) **Other information:** Rescued pursuant to Security Council resolution 1827 (2008) was included on 19 Dec. 2008

The names of individuals and entities removed from the Al-Qaida Sanctions List pursuant to a decision by the Committee may be found in the "Press Releases" section on the Committee's website. Other information about deferring may be found on the Committee's website at <http://www.un.org/sc/committees/1267/deferring.shtml>.

The Al-Qaida Sanctions List is updated regularly on the basis of relevant information provided by Member States and international and regional organizations. This is the twenty-eighth update of the List in 2012. An updated List is accessible on the Committee's website at the following URL: [http://www.un.org/sc/committees/1267/faq\\_sanctions\\_faq.shtml](http://www.un.org/sc/committees/1267/faq_sanctions_faq.shtml)

\*\*\*\*\*

For information only • not an official record

KADI0093587